

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

GREGORY SWETRA,

Plaintiff,

v.

DIRECTV, LLC,

Defendant.

Civil Case No.: 15-8761

Hon. Robert B. Kugler

Dept. 4D

**Stipulation to Extend Defendant's
Time to Respond to Complaint;
[Proposed] Order**

Plaintiff Gregory Swetra ("Plaintiff") hereby requests that this Court approve the parties' stipulation extending defendant DIRECTV, LLC's ("DIRECTV") time to respond to the Complaint for an additional 10 days. In support, Plaintiff states the following:

1. On December 19, 2015, Plaintiff filed his Complaint against DIRECTV in the above-titled action. Plaintiff's Complaint alleges violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* ("TCPA"), based on alleged phone calls from DIRECTV to Plaintiff.

2. On December 22, 2015, Plaintiff served DIRECTV with the Complaint. After the holidays, during much of which DIRECTV's legal department was closed, DIRECTV's California counsel contacted Plaintiff on January 7, 2016, and explained that DIRECTV's investigation into the facts alleged was just beginning.

3. DIRECTV asked for additional time to respond to the complaint, and the parties agreed that an initial 14-day extension should be filed with the clerk, and an additional 10-day extension then sought from the Court if necessary.

4. Thus, on January 7, 2016, Plaintiff filed an Application to Extend Defendant DIRECTV, LLC's time to respond with the clerk, requesting that DIRECTV's time to respond to the Complaint be extended 14 days to, and including, January 26, 2016.

5. On January 8, 2016, the clerk entered an Order granting an extension for DIRECTV to respond to the Complaint to, and including, January 26, 2016.

6. DIRECTV is investigating its records with respect to these alleged phone calls, so that it can respond to Plaintiff to see if resolution can be reached and if not, to otherwise fully and properly respond to Plaintiff's Complaint. Further, DIRECTV, a California corporation, needs additional time to find and retain local counsel in this action.

7. On January 25, 2016, Plaintiff's counsel conferred with Becca J. Wahlquist, DIRECTV's California-based counsel, who requested that this motion be filed by Plaintiff to seek the Court's approval of the agreed-upon extension.

WHEREFORE, Plaintiff respectfully requests that this Court approve the parties' stipulation extending DIRECTV's time to answer, move, or otherwise

respond to Plaintiff's Complaint for 10 days, such that DIRECTV's response will be due on or before February 5, 2016.

Dated: January 25, 2016

/s/ Jeremy M. Glapion
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ORDER

The Court, having considered the parties' stipulation regarding DIRECTV's responsive pleading and good cause appearing, hereby **APPROVES** the stipulation and **Orders** the following:

1. Defendant DIRECTV, LLC's time to answer, move, or otherwise respond to plaintiff Gregory Swetra's Complaint in the above-entitled action is hereby extended by 10 days, such that defendant DIRECTV, LLC's response is due on or before February 5, 2016.

It is so Ordered.

Dated: _____

Hon. Robert B. Kugler
U.S. District Court Judge